

IN THE CIRCUIT UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

EVA SARKEES,	)	
	)	
Plaintiff,	)	<b>Case No. 07 C 6370</b>
	)	
-vs-	)	<b>Judge Lefkow</b>
	)	
KELLOGG BROWN & ROOT SERVICES, INC.,	)	<b>Magistrate Judge Denlow</b>
	)	
Defendants.	)	

**AMENDED COMPLAINT AT LAW**

Now comes the Plaintiff, EVA SARKEES, by and through her attorneys, RUBIN MACHADO & ROSENBLUM LTD., and complaining of the Defendants, KBR, INC. f/k/a KELLOGG BROWN & ROOT SERVICES, INC.; and HALLIBURTON COMPANY; states as follows:

1. At all times relevant herein, the Plaintiff, EVA SARKEES, was a citizen of the United States with her primary residence located in the County of Cook and State of Illinois.
  
2. At all times relevant herein, the Defendant, KELLOGG BROWN & ROOT SERVICES, INC.(hereinafter, "KBR"), was a wholly owned subsidiary of Haliburton Company.
  
3. At all times relevant herein, the Defendant, KBR, was a duly registered corporation licensed to conduct business in the State of Illinois.
  
4. At all times relevant herein, KBR was engaged in business providing various contract services for the United States government in Iraq.
  
5. On or about October 6, 2005, the Plaintiff, EVA SARKEES, was working as a contractor on an American military base located in Northern Tikrit, Iraq.

6. At the aforesaid time and place, the Plaintiff was a pedestrian on the aforesaid military base.

7. At the aforesaid time and place the Plaintiff, EVA SARKEES, was struck by a motor vehicle owned, leased and/or otherwise controlled by the Defendant, KBR.

8. At the aforementioned time and place, an unidentified employee, agent, and/or apparent agent of KBR, was operating a motor vehicle at the aforesaid time and place.

9. At all times relevant herein, the motor vehicle operated by the unidentified driver, was owned, leased, or otherwise controlled by the Defendant, KBR.

10. At all times relevant herein, the unidentified driver was performing his regular duties as an employee, agent, apparent agent, and/or servant of the Defendant, KBR.

11. At the aforementioned time and place, the Defendant, KBR, by and through its employee, agent, apparent agent, and/or servant, owed a duty of ordinary care to the Plaintiff, EVA SARKEES, to operate its motor vehicle in a reasonably safe manner.

12. At the aforementioned time and place, the Defendant, KBR, breached its duty to the Plaintiff by engaging in one or more of the following negligent acts or omissions:

- a. Failed to keep a proper lookout;
- b. Failed to yield to pedestrian;
- c. Operated a motor vehicle at an unreasonably excessive rate of speed;
- d. Failed to exercise due care to avoid colliding with the plaintiff;
- e. Failed to take appropriate evasive action to avoid collision with the Plaintiff's.
- f. Failed to apply brakes when it was necessary to do so; and/or
- g. Was otherwise careless and/or negligent.

13. As a direct and proximate result of the above careless and/or negligent acts, the Plaintiff, EVA SARKEES, suffered severe injuries, both in mind and body.

14. The negligent acts of the Defendant, KBR, through its unidentified employee, agent, and/or servant, were the proximate cause of the injuries to the Plaintiff, EVA SARKEES, as herein defined.

15. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, KBR, the Plaintiff, EVA SARKEES, then and there sustained severe and permanent injuries, internally and externally, and was and will be hindered from attending to her usual affairs and duties, and has lost and will in the future lose the value of that time as aforementioned. Plaintiff has also suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. Further, Plaintiff has expended and become liable for, and will expend and become liable for, large sums of money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE, Plaintiff, EVA SARKEES, demands judgment against the Defendant, Defendant, KELLOGG BROWN & ROOT SERVICES, INC., in a sum in excess of FIFTY THOUSAND AND 00/100 DOLLARS (\$50,000.00) and costs of suit.

Respectfully submitted,

/s/David L. Goldberg  
By: David L. Goldberg  
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